

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff

-v-

21-CV-

\$49,888.09 SEIZED FROM BANK OF AMERICA
ACCOUNT NO. 375022063898, HELD IN THE
NAME OF ALI ZEINEDDINE D/B/A LASSA
LOGISTICS LLC, and

\$7,024.96 SEIZED FROM BANK OF AMERICA
ACCOUNT NO. 375017199406, HELD IN THE
NAME OF ALI ZEINEDDINE D/B/A LASSA
LOGISTICS LLC,

Defendants.

VERIFIED COMPLAINT FOR FORFEITURE

The United States of America, by its attorneys, James P. Kennedy, Jr., United States Attorney for the Western District of New York, Grace M. Carducci, Assistant United States Attorney, of counsel, for its verified complaint herein alleges as follows:

1. This is an action in rem for the forfeiture of \$49,888.09 and \$7,024.96 United States currency (hereinafter collectively “the defendant properties”) which were seized on March 19, 2021 from Bank of America account # 375022063898 (hereinafter “BOA #3898”) and # 375017199406 (hereinafter “BOA #9406”), held in the name of Ali Zeineddine d/b/a Lassa Logistics LLC. The defendant properties are subject to forfeiture pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 984, as any property, real or personal, which constitutes or is derived from proceeds traceable to any offense constituting “specified

unlawful activity”, as defined in Title 18, United States Code, Section 1956(c)(7) (hereinafter referred to as “SUA”), to include violations of Title 18, United States Code, Sections 1030, 1343, and 1349 (Unauthorized Access to Computer Systems, Wire Fraud, and Conspiracy to Commit Wire Fraud).

2. The jurisdiction of this Court is invoked pursuant to Title 28, United States Code, Sections 1345, 1355, and 1395. Venue is properly premised in the Western District of New York pursuant to Title 28, United States Code, Section 1395.

3. The defendant properties were seized pursuant to a Federal Seizure Warrant on March 19, 2021. The defendant currency is now in the custody of the Federal Bureau of Investigation (“FBI”), Western District of New York, and is held within the jurisdiction of this Court.

FACTS

4. The facts and circumstances supporting the forfeiture of the defendant properties are contained in the Affidavit of Federal Bureau of Investigation (“FBI”) Special Agent Corey P. Lyons, a copy of which is attached hereto as Exhibit 1 and incorporated as though fully set forth herein, and has been provided to the Court with an application that it remain under seal until further Order of the Court.

CONCLUSION AND REQUESTS FOR RELIEF

5. Based upon the foregoing, the government submits that the defendant properties are subject to forfeiture to the United States of America pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 984, as any property, real or personal, which constitutes or is derived from proceeds traceable to any offense constituting SUA to wit:

namely Unauthorized Access to Computer System, Wire Fraud and Conspiracy to Commit Wire Fraud, in violation of Title 18 United States Code, Sections 1030, 1343 and 1349.

WHEREFORE, the United States of America respectfully requests that:

- (1) that an arrest warrant in rem be issued for the arrest of the defendant properties;
- (2) that notice of this action be given to all persons known or thought to have an interest in or right against the defendant properties;
- (3) that a judgment be entered declaring the defendant properties be condemned and forfeited to the United States of America for disposition in accordance with the law;
- (4) that the costs of this suit be paid to and recovered by the United States of America; and
- (5) that the Court grant such order and further relief as deemed just and proper.

DATED: August 12, 2021 at Rochester, New York

JAMES P. KENNEDY, JR.
United States Attorney
Western District of New York

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STATE OF NEW YORK)
COUNTY OF ERIE) ss.:
CITY OF BUFFALO)

Corey P. Lyons, being duly sworn, deposes and says:

I am a Special Agent of Federal Bureau of Investigations (FBI), in the Western District of New York, and I am familiar with the facts and circumstances surround the seizure of \$49,888.09 and \$7,024.96 which were seized on March 19, 2021 from Bank of America accounts # 375022063898 and # 375017199406, held in the name of Ali Zeineddine d/b/a Lassa Logistics LLC. The matters alleged in the Verified Complaint for Forfeiture and the attached Exhibit are true to the best of my knowledge and belief, and were obtained during the course of the investigation of the defendant properties from the official files of Federal Bureau of Investigation and provided to the officials of the United States Department of Justice, United States Attorney's Office.

s/COREY P. LYONS
Corey P. Lyons
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before
me this 12th day of August, 2021.

s/Gabriela Rodriguez
Gabriela Rodriguez
Notary Public, State of New York
Qualified in Niagara County
Commission Expires 9/4/2022